

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ROYAL SLEEP PRODUCTS, INC.  
a Florida Corporation,

Plaintiff.

v.

RESTONIC CORPORATION,  
an Illinois Corporation,  
RESTONIC MATTRESS CORPORATION,  
an Illinois Corporation,  
SLEEP ALLIANCE, LLC,  
a Delaware Limited Liability Company,  
ROYAL BEDDING COMPANY OF BUFFALO,  
a New York Corporation,  
JACKSON MATTRESS CO., LLC,  
a North Carolina Limited Liability Company,  
CONTINENTAL SILVERLINE PRODUCTS L.P.,  
a Texas Limited Partnership,  
STEVENS MATTRESS MANUFACTURING CO.,  
a North Dakota Corporation,  
TOM COMER, JR., an individual,  
DREW ROBINS, an individual, and  
RICHARD STEVENS, an individual

Defendants.

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Case No.: 1:07 CV 6588

Hon. Rebecca R. Pallmeyer

Magistrate Judge Valdez

**CONSENT MOTION FOR EXTENSION OF TIME TO COMPLETE PERSONAL  
JURISDICTION DISCOVERY AND FOR POSTPONEMENT OF JUNE 5, 2008 STATUS  
CONFERENCE**

Plaintiff, Royal Sleep Products, Inc., by and through undersigned counsel, and with the consent of all of the Defendants, hereby requests: (1) a thirty (30) day extension of time in which to conduct discovery on personal jurisdiction; and (2) a postponement of the June 5, 2008 Status Conference. In support thereof, Plaintiff states as follows:

1. On April 3, 2008, the Court conducted a Rule 16 Pretrial Conference in the instant proceeding (the “Rule 16 Conference”).

2. Following the completion of the Rule 16 Conference, also on April 3, 2008, the Court entered a Minute Order setting June 6, 2008, as the deadline for the completion of discovery related to personal jurisdiction (the “June 6, 2008 Deadline”).

3. Due to the press of business and the difficulty the parties’ have experienced in finding convenient times in which to schedule the defendants’ jurisdiction-related depositions, personal jurisdiction discovery will not be complete by the June 6, 2008 Deadline.

4. Through this motion, Plaintiff, with the Defendants’ consent, seeks a thirty (30) day extension of time in which to complete personal jurisdiction discovery. Accordingly, the Plaintiff proposes July 7, 2008 as the new deadline for completion of personal jurisdiction discovery.

5. Furthermore, a status conference in this case is currently set for June 5, 2008 (the “Status Conference”). Given the fact that personal jurisdiction discovery will not be complete by that date, the Plaintiff, also with the Defendants’ consent, and in order to make the Status Conference as productive as possible, seeks a postponement of the Status Conference to a date subsequent to the proposed July 7, 2008 personal jurisdiction deadline.

6. Plaintiff submits that this motion is brought in good faith and not designed to hinder these proceedings.

WHEREFORE, Plaintiff, Royal Sleep Products, Inc., with the consent of the Defendants, hereby requests that this Court enter an Order:

(1) Granting the parties a thirty (30) day extension of time in which to complete personal jurisdiction discovery;

- (2) Setting July 7, 2008, as the new deadline for completion of personal jurisdiction discovery;
- (3) Postponing the June 5, 2008 Status Conference to a date after the expiration of the proposed July 7, 2008, personal jurisdiction discovery deadline; and
- (4) For such other and further relief as the Court deems necessary and proper.

Respectfully submitted,

**ZARCO EINHORN SALKOWSKI & BRITO, P.A.**

*Counsel for Plaintiff*

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By: /s/ Robert Salkowski

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(All admitted *Pro Hac Vice*)

*and*

**LAW OFFICES OF BRIAN IRA TANENBAUM, LTD.**

*Counsel for Plaintiff*

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By: /s/Brian Ira Tanenbaum

Brian Ira Tanenbaum, Esq.

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was served via the court's electronic mail and/or via U.S. Mail upon the parties listed below on this 27th day of May 2008.

By: /s/Brian Ira Tanenbaum  
BRIAN IRA TANENBAUM

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